

**REMARKS**

In the Office Action mailed September 3, 2003 (paper no. 8), Claims 15, 18 – 22, 25, and 27 were rejected as anticipated by U.S. Pat. No. 5,040,484 (“Mears”) and Claims 17 and 23 were identified as allowable except for their dependence on rejected claims.

1. Claims 15 and 18 – 23

Independent Claim 15 has been amended to incorporate the limitation of Claim 17, which was identified as allowable, and Claim 17 has been canceled. It is accordingly believed that the set of Claims 15 and 18 – 23 is allowable.

2. Claims 25, 27, 35 – 42

The Office Action refused to give patentable weight to certain limitations in independent Claims 15 and 25, indicating that they expressed “merely intended use.” Claim 25 has accordingly been amended to positively recite a MEMS die secured within one of the means for securing. Similarly, Claims 35 – 42 have been added to parallel prior Claims 15 and 17 – 23 with a positive recitation of a MEMS die secured in at least one station (*see, e.g.*, Application, Fig. 1). There is no disclosure in the cited art of a MEMS die secured in the manner recited in these claims. Furthermore, the disclosure of Mears does not suggest securing a MEMS die in the manner recited. Mears is directed specifically to an apparatus for retaining semiconductor wafers as part of a semiconductor processing system (Mears, abstract). There are significantly different considerations in conventional semiconductor processing and MEMS processing, as noted in the Application (Application, p. 1, l. 17 – p. 2, l. 17). For example, the Mears system is intended to operate as a centrifuge that provides forces of about 500 g’s on the wafers (Mears, Col. 6, ll. 58 – 63). While such processes may be used on semiconductor wafers having diameters measuring on the order of hundreds of millimeters, they are very likely to damage the much smaller and more delicate MEMS dice that are produced by dicing such larger wafers (*see*

Application, p. 1, ll. 24 – 26). The Application specifically notes the increased danger of damage from debris and contamination to MEMS dice, a concern that would be significant with an attempt to adapt the Mears centrifuge operations to other than its described semiconductor-wafer use.

### 3. Claims 28 – 34

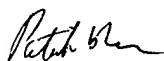
Claims 28 – 34 have been added. They parallel the prior set of Claims 15 and 17 – 23, but include the limitation of Claim 22 that the article be formed as a single continuous structure. Applicants respectfully disagree with the assertion in the Office Action that Mears teaches an article formed as a single continuous structure. The fingers  $f_1 - f_{14}$  identified in the Office Action as corresponding to the recited retaining arms are not formed continuously with the platen 102, but are instead separate pieces, as is evident in Fig. 12 of Mears. The structure in Mears thus requires assembly from the separate platen and finger pieces, contrary to the meaning of “single continuous structure” that has been provided.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

  
Patrick M. Boucher  
Reg. No. 44,037

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834

Appl. No. 09/941,325

Amdt. dated November 11, 2003

Reply to Office Action of September 3, 2003 (paper no. 8)

PATENT

Tel: 303-571-4000

Fax: 415-576-0300

PMB:pmb

60078310 v1